

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF VIRGINIA Richmond Division

LIBERTARIAN NAT'L) COMMITTEE, INC.,)) Plaintiff,))

v.

) Civil Action No. 3:23cv155 (RCY)

) ROBERT KLOR DEAN,)) Defendants.))

Dear Judge Young:

With respect to the Court, comes before you now the Defendant to
acknowledge allegations in paragraph of Case 3:23-cv-00155-RCY.

Page 4 Paragraph 10. The Defendant offers the following correction:
The Tidewater Libertarian Party (TLP) was formed in January 2001, not
2020.

Page 4 Paragraph 11. The Defendant offers the following correction:
The Facebook page was created in 2007, not 2020.

Page 5 Paragraph 12. As a registered Affiliate of the Libertarian Party
since 2001, we were in fact authorized to use the name.

Page 5 Paragraph 13. As a registered Affiliate since 2001, the
Libertarian Party of Virginia requires a vote of the SCC members to
remove our affiliation and that we be notified of the vote. We never
received an official notice from the Virginia State Party that a meeting
and vote took place.

Page 5 Paragraph 13. Until June 3, 2022, the Tidewater Libertarian Party
never received a legal letter stating that the TLP was in violation of the
22-year use of our name.

Page 6 Paragraph 15. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors.

Page 6 Paragraph 16. This registration will be terminated by the TLP Board of Directors.

Page 6 Paragraph 17. This registration will be terminated by the TLP Board of Directors

Page 7 Paragraph 18. This registration will be terminated by the TLP Board of Directors

Page 8 Paragraph 20, 21, 22, 23, 24, 25. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors.

Page 8 Paragraph. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors.

Page 12 Paragraph 31, 32, 33, 34, 35,36,37, 38, 39The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors.

Page 13 Paragraph 40, 41, 42. There has been no demonstrated willful or otherwise harm to the Virginia or National Libertarian Party, and these charges need to be dismissed.

Page 13, Paragraph 43,44, 45, 46, 47, 48, 49, The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors.

Page 14 Paragraph 50, 51,52,53,54, 55, 56, 57, 58, 59. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as

an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors. There has been no demonstrated willful or otherwise harm to the Virginia or National Libertarian Party, and these charges need to be dismissed.

Page 15, Paragraph and 60,61,62,63,64,65, 66, 67,68,69 70. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors. There has been no demonstrated willful or otherwise harm to the Virginia or National Libertarian Party, and these charges need to be dismissed.

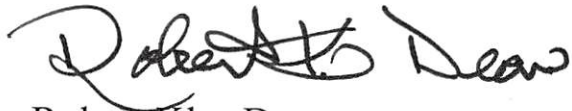
Page 16 Paragraph 71, 72, 73, 74, 75, 76, 77, 78. The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors. There has been no demonstrated willful or otherwise harm to the Virginia or National Libertarian Party, and these charges need to be dismissed.

Page 17 a., b., c., d., ., e., f., The registration of the TLP with the VA SCC had been ongoing for the past 22 years as an authorized Affiliate by the Libertarian Party of Virginia. This registration will be terminated by the TLP Board of Directors. There has been no demonstrated willful or otherwise harm to the Virginia or National Libertarian Party, and these charges need to be dismissed.

It is requested that all of these charges brought against myself, Robert Klor Dean, serving as Chairman of the Tidewater Libertarian Party (TLP) be dismissed, as I was acting as the representative of the TLP and not an individual. The TLP Board has acknowledged that all actions shown in this suit should have been directed toward the TLP. Further, the TLP has directed me to drop all names of which the TLP has been accused of violating from the VA State Corporation Commission and not to use the Tidewater Libertarian Party name in the future.

It is requested that the Court order the parties to engage in mediation in an effort to settle this case.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Klor Dean". The signature is fluid and cursive, with the first name "Robert" being more prominent and the last name "Dean" following in a similar style.

Robert Klor Dean

I have mailed copies of this response to the Plaintiff's Counsels:

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